

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS**

JARROD MCKINNEY,

Plaintiff,

v.

THOMAS J. VILSACK, in his official
capacity as Secretary of the United States
Department of Agriculture, et al.,

Defendants.

No. 2:21-cv-00212-RWS

UNOPPOSED MOTION TO WITHDRAW AS COUNSEL

1. I, Randolph T. Chen of the law firm Public Justice, PC and counsel for proposed *amici curiae* the National Black Farmers Association (NBFA) and the Association of American Indian Farmers (AAIF), respectfully request to be permitted to withdraw as counsel for NBFA and AAIF in this matter pursuant to LR CV-11(c). The reason for this request is that I will no longer be employed at Public Justice, PC after September 7, 2021.

2. Additionally, I respectfully request that the Clerk of the Court remove me from the list of persons authorized to receive electronic notices in this case.

3. NBFA and AAIF are represented in this action and will continue to be represented by the following co-counsel from Public Justice, PC:

David S. Muraskin (D.C. Bar No. 1012451) (admitted *pro hac vice*)
Jessica L. Culpepper (D.C. Bar No. 988976) (admitted *pro hac vice*)
PUBLIC JUSTICE, PC
1620 L Street NW, Suite 630
Washington, D.C. 20036
Telephone: (202) 797-8600
Facsimile: (202) 232-7203
dmuraskin@publicjustice.net
jculpepper@publicjustice.net

4. **LR CV-7(h) Certificate of Conference.** I certify that I complied with the meet-and-confer requirement in LR CV-7(h) and conferred with counsel for Plaintiff and Defendants in this action, who stated they consent to the relief requested in this motion.

Respectfully submitted,

Date: Aug. 25, 2021

/s/ Randolph T. Chen

Randolph T. Chen (D.C. Bar No. 1032644)

(admitted *pro hac vice*)

PUBLIC JUSTICE, PC

1620 L Street NW, Suite 630

Washington, D.C. 20036

Telephone: (202) 797-8600

Facsimile: (202) 232-7203

rchen@publicjustice.net

*Counsel for Proposed Amici Curiae the
National Black Farmers Association and the
Association of American Indian Farmers*

CERTIFICATE OF SERVICE

I hereby certify that on August 25, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ Randolph T. Chen

Randolph T. Chen